

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA

In re:	)	Case No. 24-80617
	)	(Chapter 11)
C M HEAVY MACHINERY.	)	
	)	
Debtor.	)	
	)	

**DECLARATION IN SUPPORT OF APPLICATION TO APPROVE EMPLOYMENT OF  
LOGAN DAHLK AND RECEIVABLES CONTROL CORPORATION AS  
RETAINER FOR RECEIVABLES RECOVERY TO ABOVE-CAPTIONED DEBTOR**

1. My name is Logan Dahlk, I am over the age of eighteen, and I am competent to testify to the matters set forth herein.

2. I graduated from the Minnesota State University of Mankato in May of 2021, earning my bachelor's degree in business management.

3. I have been employed by Receivables Control Corporation (RCC), since April of 2022. I have retained positions as a commercial collector along with a national client manager for our clients utilizing our services.

4. Founded in 1970, Receivables Control Corporation (RCC) is a trusted leader in global commercial debt recovery, serving clients worldwide. Recovering over \$100,000,000 per year for our clients, RCC has adequate experience and services to recover the balance owed for the debtor.

5. Our division, Asset Recovery Group, has assisted companies in bankruptcy or liquidation for nearly 40 years assisting with recovering receivables, assisting the debtor's staff or counsel with recovery, or purchasing portfolios of receivables.

6. I intend to focus our practice on recovering receivables contingently while applying our skills and services to maximize the full potential of recoveries.

7. If an account is deemed uncollectable, we will recommend legal action to the debtor and to the court for approval prior to initiating legal action. All potential candidates will be compensated via contingent recovery of the balance and the candidates will be chosen based off the location of the debtor.

8. RCC compensation for recovery of the debtors outstanding receivables, totaling \$492,994.09, shall be 35% of all funds recovered, subject to approval by the Bankruptcy Court.

9. I am disinterested as that term is defined in 11 U.S.C. §101(14). I (i) am not a creditor, an equity security holder, or an insider of C M Heavy Machinery, LLC (the “Debtor”); (ii) am not and was not, within two years before the date of filing of the petition for relief, a director, officer, or employee of the Debtor; and (iii) do not have an interest materially adverse to the interest of the estate or any class of creditors or equity security holders, by reason of any director or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason. Further, I hold not interest adverse to the Debtor.

10. For clarity, I have no prior economic relationship with the Debtor, nor have I been previously employed by the Debtor. My work with the Debtor is limited to this proposed engagement as collection agents.

11. I have no connection with the Debtor, the Debtor’s creditors, any other party in interest, their respective attorneys or accountants, the United States Trustee, or any person employed in the Office of the United States Trustee.

12. All facts contained in the application to which this declaration is affixed are true and correct to the best of my knowledge.

I, Logan Dahlk pursuant to Section 1746 of Title 29 of the United States Code, do hereby declare, under the penalty of perjury, that I have personal knowledge of the matters set forth herein and the foregoing are true and correct.

Dated: May 15, 2025

By: /s/ Logan Dahlk  
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